

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

WILLIAM C. BOND,

*

Plaintiff

*

v.

* Civil Action No.: MJG-01-CV-2600

KENNETH BLUM, SR., *et al.*,

*

Defendants

*

* * * * *

REPLY MEMORANDUM IN SUPPORT OF
PLAINTIFF'S MOTION TO EXTEND RULE 30(e) TIME
FOR WITNESS TO REVIEW DEPOSITION
AND RESPONSE TO ADELBERG, RUDOW
REQUEST FOR SANCTIONS (PAPER NO. 204)

Now come Howard J. Schulman and Schulman & Kaufman, LLC and state as follows:

Adelberg, Rudow cannot claim prejudice in delay by virtue of any extension to permit Bond to review his own deposition, given that Adelberg appears to have received the original of the deposition on or about October 14, 2003, the date on which the court reporting service notified Bond's counsel that the deposition was ready to review. *See* attached notice from the court reporter.

Adelberg also requests monetary sanctions in the amount of \$150 a day by virtue of Bond's request for an extension. Bond, in seeking an extension, however, has not failed to provide any discovery or failed to comply with any court order. Thus, Adelberg is not entitled to any sanctions by virtue of Fed.R.Civ.Pro. 37.

WHEREFORE, for the aforementioned reasons, Plaintiff, William C. Bond, respectfully requests that the Court grant his motion to extend the time for him to review his deposition and deny Adelberg, Rudow's request for attorney's fee.

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